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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANSELMO BERNAL,
Plaintiff,
v.
AMERICAN REPROGRAPHICS
COMPANY, et al.; and DOES 1 - 20,
Defendants.

CASE NO.: C 13-0750 KAW

**STIPULATED MOTION TO MODIFY
SCHEDULING ORDER, ~~PROPOSED~~
ORDER, AND DECLARATION OF
COUNSEL**

STIPULATED MOTION

On May 24, 2013, the Court entered its Case Management and Pretrial Order for Jury Trial (“CASE MANAGEMENT SCHEDULING ORDER,” ECF No. 15) in the above captioned action. Discovery has commenced in this action. Plaintiff has served interrogatories, requests for production, and requests for admissions. The plaintiff and defendant are meeting and conferring to resolve discovery disputes that have arisen. The following depositions are currently scheduled:

Deponent	Scheduled Date
ARC employee Janine Sperry	August 16, 2013
Plaintiff Anselmo Bernal	August 21, 2013
ARC employee Soren Goodman	September 6, 2013
ARC employee Voltaire "Butch" Balancio	TBD

Plaintiff anticipates that he will have insufficient time to complete discovery by the September 30, 2013 discovery cut-off date. In order to foster efficiency, the parties have agreed to request that the Court modify the deadlines imposed by the current Case Management Scheduling Order.

Specifically, the parties, by and through their respective counsel, move the court to amend the Case Management Scheduling Order as set forth in the following table:

EVENT	SCHEDULING ORDER	PROPOSED SCHEDULE
Trial	January 21, 2014	May 27, 2014
Pretrial Conference	January 7, 2014	May 12 ¹³ , 2014
Objections	December 30, 2013	May 5, 2014
Joint Pretrial Statement	December 20, 2013	April 25, 2014
Meet and Confer	December 10, 2013	April 15, 2014
Last Day to hear Dispositive Motions	November 7, 2013	March 13 ⁶ , 2014
Close of Fact and Expert Discovery	September 30, 2013	February 3 ²⁰ , 2014
Rebuttal Expert Disclosure	September 16, 2013	January 21 , 2014
Expert Disclosure	September 2, 2013	January 6, 2014

The proposed modifications do not change the current times between events, and do not reduce the time available to the Court to review materials between events such as the last day for dispositive motions and trial.

Accordingly, plaintiff Anselmo Bernal and Defendant ARC Document Solutions, Inc., by and through their respective undersigned counsel, respectfully request that the Court enter an order modifying the schedule as set forth above.

Dated: August 14, 2013

JACKSON LEWIS LLP

By: /S/
Conor J. Dale
Attorneys for Defendant,
ARC DOCUMENT SOLUTIONS, INC.

Dated: August 14, 2013

THE CO LAW FIRM

By: _____ /S/
Patrick R. Co
Attorney for Plaintiff,
ANSELMO BERNAL

[proposed] ORDER

PURSUANT TO STIPULATION OF THE PARTIES IT IS SO ORDERED.

Dated: August 15 , 2013

KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE